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Attorneys for Defendant  
TIJUANA, LLC

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RUDI JIMENEZ,

Plaintiff,

vs.

TIJUANA, LLC, d/b/a ADVANCE MEDICAL  
STAFFING, d/b/a RAPID TEMPS, INC., a  
domestic limited liability company; DOES I-X;  
and ROE BUSINESS ENTITIES I-X,  
inclusive,

Defendants.

Case No.: 2:20-cv-00765-RFB-VCF

**STIPULATION TO EXTEND TIME FOR  
DEFENDANT TO FILE ITS REPLY IN  
SUPPORT OF MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT**

**(First Request)**

IT IS HEREBY STIPULATED by and between Plaintiff RUDI JIMENEZ ("Plaintiff"), through his counsel, MAIER GUTIERREZ & ASSOCIATES, and Defendant, RAPID TEMPS, INC. d/b/a/ TIJUANA, LLC ("Defendant"), by and through its counsel, Jackson Lewis P.C., hereby stipulate and agree to extend the time for Defendant to file its reply in support of motion to dismiss the Plaintiff's Complaint, which is currently due on July 8, 2020, until July 15, 2020.

1. The parties believe these extensions are appropriate because Counsel for Defendant's drill schedule with the Army National Guard was adjusted unexpectedly due to the COVID-19 pandemic, and accordingly Defendant needs a brief extension for its reply.

2. This stipulation and order are sought in good faith and not for the purpose of delay.

3. This is the first request for an extension for Defendant to file its reply in support of Motion to Dismiss.

4. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 8<sup>th</sup> day of July, 2020

MAIER GUTIERREZ & ASSOCIATES

JACKSON LEWIS P.C.

/s/ Joseph N. Mott

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Attorneys for Defendant

**ORDER**

IT IS SO ORDERED.

  
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RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 13th day of July, 2020.

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